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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CATALIN LAURENTIU BOTA,

Plaintiff,

v.

ALEJANDRO MAYORKAS, in his official  
capacity as Secretary of Homeland Security,  
U.S. DEPARTMENT OF HOMELAND  
SECURITY, UR M. JADDOU, in her  
official capacity as Acting Director of U.S.  
Citizenship and Immigration Services, U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES, the UNITED STATES OF  
AMERICA and JOHN DOES I through  
XX, inclusive,

Defendants.

Case No. 2:23-cv-01948-GMN-DJA

**Stipulation and Order**

**(First Request)**

Plaintiff Catalin Laurentiu Bota and Defendants Alejandro Mayorkas, Secretary of  
Homeland Security, US Department of Homeland Security, Ur M. Jaddou, Acting  
Director of U.S. Citizenship and Immigration Services, United States Citizenship and  
Immigration Services and United States of America ("Federal Defendants"), hereby  
stipulate and agree as follows:

Plaintiff filed his Complaint on November 22, 2023.

Plaintiff served the United States with a copy of the Complaint via Certified Mail on  
November 30, 2023.

1 The current deadline for the United States to respond to the Plaintiffs' Complaint is  
2 on January 29, 2024.

3 Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and  
4 request that the Court approve a 45-day extension of time, from January 29, 2024, to  
5 March 14, 2024, for Federal Defendants to file a response to the Complaint, ECF No. 1.  
6 This is the first request for an extension of time.

7 Plaintiff's interview regarding his petition is scheduled on January 23, 2024. The  
8 additional 45 days are necessary to complete the interview process and the request for any  
9 additional information regarding the plaintiff's petition with the United States Citizenship  
10 and Immigration Services.

11 Therefore, the parties request that the Court extend the deadline for the United States  
12 to answer or otherwise respond to March 14, 2024.

13 This stipulated request is filed in good faith and not for the purposes of undue delay.

14 Respectfully submitted this 17th day of January, 2024.

15 REZA ATHARI, MILLS & FINK, PLLC

JASON M. FRIERSON  
United States Attorney

17 /s/ Gary Fink  
18 GARY FINK, ESQ.  
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*Attorney for Plaintiffs*

/s/ Virginia T. Tomova  
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21 **IT IS SO ORDERED:**

22 

23 **UNITED STATES MAGISTRATE JUDGE**

24 **DATED:** 1/18/2024